

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|----------------------------|---|--------------------|
| ROTHSCHILD BROADCAST |) | |
| DISTRIBUTION SYSTEMS, LLC, |) | |
| |) | |
| Plaintiff, |) | C.A. No. 20-392-MN |
| |) | |
| v. |) | |
| |) | |
| DEEZER, INC., |) | |
| |) | |
| Defendant. |) | |

**DEFENDANT DEEZER, INC.'S MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and 35 U.S.C. § 101 Defendant Deezer, Inc. ("Deezer") hereby moves to dismiss with prejudice Plaintiff Rothschild Broadcast Distribution Systems, LLC's First Amended Complaint (D.I. 11) for failure to state a claim upon which relief may be granted. The grounds for this motion are set forth in Deezer's Opening Brief, which is submitted herewith.

Respectfully submitted,

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